VIRGINIA ELECTRIC AND POWER COMPANY RICHMOND, VIRGINIA 23261

10 CFR 50.92

October 28, 2004

U.S. Nuclear Regulatory Commission Attention: Document Control Desk Washington, D.C. 20555 Serial No. NL&OS/GDM Docket Nos 04-280A R0

Docket Nos. 50-280

50-281

License Nos.

DPR-32 DPR-37

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNITS 1 AND 2
PROPOSED TECHNICAL SPECIFICATION CHANGE
REVISION OF AUXILIARY FEEDWATER REQUIREMENTS AND SURVEILLANCES

In a letter dated May 13, 2004 (Serial No. 04-280), Virginia Electric and Power Company (Dominion) submitted a Technical Specifications (TS) change request for NRC review and approval. The proposed change included revisions to TS 3.6, Turbine Cycle, to clarify the auxiliary feedwater pump required action statement and to add an AFW flowpath required action statement. The intent of the change was to achieve consistency between existing operability requirements and required actions for an inoperable AFW pump as well as to address the lack of an allowed outage time and required actions for an inoperable AFW flowpath.

During the course of the review, the NRC requested that the AFW pump operability requirement be rewritten consistent with NUREG-1431, "Standard Technical Specifications – Westinghouse Plants." Based on short-term scheduling constraints, Dominion is unable to promptly address the issue. Therefore, Dominion requests that the existing licensing action (i.e. TAC items MC3161 and MC3162) be closed. It is our intention to supersede the existing submittal with a change request, which will address the above-mentioned NRC issue.

If you have any further questions or require additional information, please contact Mr. Gary Miller at 804-273-2771.

Very truly yours,

Leslie N. Hartz

Vice President - Nuclear Engineering

Attachments: None

Commitments made by this letter: None

cc: U.S. Nuclear Regulatory Commission Region II Sam Nunn Atlanta Federal Center Suite 23T85 61 Forsyth Street, SW Atlanta, Georgia 30303

> Mr. N.P. Garrett NRC Senior Resident Inspector Surry Power Station

Commissioner
Bureau of Radiological Health
1500 East Main Street
Suite 240
Richmond, VA 23218